#### IN THE UNITED STATES PATENT AND TRADEMARK OFFICE

In re application of: Childress et al.

Serial No. 10/809,584

Serial No. 10/809,584

Examiner: Duncan, Marc M.

Filed: March 25, 2004

For: Presence-Based System

Management Information Routing
System

Commissioner for Patents P.O. Box 1450 Alexandria, VA 22313-1450

35525
PATENT TRADEMARK OFFICE
CUSTOMER NUMBER

## **APPEAL BRIEF (37 C.F.R. 41.37)**

This brief is in furtherance of the Notice of Appeal, filed in this case on February 13, 2007.

A fee of \$500.00 is required for filing an Appeal Brief. Please charge this fee to IBM Corporation Deposit Account No. 09-0447. No additional fees are believed to be necessary. If, however, any additional fees are required, I authorize the Commissioner to charge these fees which may be required to IBM Corporation Deposit Account No. 09-0447. No extension of time is believed to be necessary. If, however, an extension of time is required, the extension is requested, and I authorize the Commissioner to charge any fees for this extension to IBM Corporation Deposit Account No. 09-0447.

# **REAL PARTY IN INTEREST**

The real party in interest in this appeal is the following party: International Business Machines Corporation of Armonk, New York.

# RELATED APPEALS AND INTERFERENCES

With respect to other appeals or interferences that will directly affect, or be directly affected by, or have a bearing on the Board's decision in the pending appeal, there are no such appeals or interferences.

# **STATUS OF CLAIMS**

## A. TOTAL NUMBER OF CLAIMS IN APPLICATION

Claims in the application are: 1-20.

## B. STATUS OF ALL THE CLAIMS IN APPLICATION

- 1. Claims canceled: None.
- 2. Claims withdrawn from consideration but not canceled: None.
- 3. Claims pending: 1-20.
- 4. Claims allowed: None.
- 5. Claims rejected: 1-20.
- 6. Claims objected to: 20.

#### C. CLAIMS ON APPEAL

The claims on appeal are: 1-20.

## **STATUS OF AMENDMENTS**

A Response to Office Action was filed on October 24, 2006. A Final Office Action was mailed on November 13, 2006. An amendment after final rejection was not filed. Therefore, claims 1-20 on appeal herein are as amended in the Response to Office Action filed October 24, 2006.

## SUMMARY OF CLAIMED SUBJECT MATTER

#### A. CLAIM 1 - INDEPENDENT

The subject matter of claim 1 is directed to a data processing system (Figure 1, element 100, Figure 2, element 200, and Figure 3, element 300) for routing system management information (Specification, page 11, lines 8-12) that includes a plurality of notification units (Specification, page 12, line 1 – page 13, line 17). The plurality of notification units are coupled to a network (Specification, page 13, lines 18-19 and Figure 4, element 400). The network operable to determine whether each notification unit of the plurality of notification units is available to receive system management information (Specification, page 13, line 19 - page 14, line 11). A plurality of management units are coupled to the network (Specification, page 14, lines 17-23 and Figure 4. element 400). At least one management unit of the plurality of management units is configured to generate the system management information (Specification, page 14, line 17 – page 15, line 5), determine an identity of an intended recipient for the system management information (Specification, page 3, lines 9-12), associate the identity with at least one notification unit of the plurality of notification units (Specification, page 15 line 6 – page 16, line 5), determine whether the at least one notification unit is available to receive said system management information (Specification, page 3, lines 12-15), and send the system management information to the at least one notification unit via a notification handler if the at least one notification unit is available to receive the system management information (Specification, page 3, lines 15-17).

#### B. CLAIM 8 - DEPENDENT

The subject matter of claim 8 is directed to the data processing system of claim 1 (see Section A above). The intended recipient comprises at least one of an entity, party, and person having a responsibility for responding to said system management information (Specification, page 11, lines 13-16).

#### C. CLAIM 10 - INDEPENDENT

The subject matter of claim 10 is directed to a method in a data processing system for routing system management information (Specification, page 3, lines 1-4). A network is coupled to

a plurality of notification units (Specification, page 13, lines 18-19 and Figure 4, element 400). The network determining whether each notification unit of the plurality of notification units is available to receive system management information (Specification, page 13, line 19 – page 14, line 11). A plurality of management units are coupled to the network (Specification, page 14, lines 17-23 and Figure 4, element 400). At least one management unit of the plurality of management units is generating the system management information (Specification, page 14, line 17 – page 15, line 5), determining an identity of an intended recipient for the system management information (Specification, page 3, lines 9-12), associating the identity with at least one notification unit of the plurality of notification units (Specification, page 15 line 6 – page 16, line 5), determining whether the at least one notification unit is available to receive the system management information (Specification, page 3, lines 12-15), and sending the system management information to the at least one notification unit via a notification handler if the at least one notification unit is available to receive the system management information to the at least one notification unit via a notification handler if the at least one notification unit is available to receive the system management information (Specification, page 3, lines 15-17).

#### D. CLAIM 17 - DEPENDENT

The subject matter of claim 17 is directed to the method of claim 10 (see Section C above). The intended recipient comprises at least one of an entity, party, and person having a responsibility for responding to said system management information (Specification, page 11, lines 13-16).

#### E. CLAIM 19 - INDEPENDENT

The subject matter of claim 19 is directed to a computer program product in a computer-readable medium (Specification, page 16, line 16 – page 17, line 4) for routing system management information (Specification, page 3, lines 1-4). First instructions for coupling a network to a plurality of notification units (Specification, page 13, lines 18-19 and Figure 4, element 400). Second instructions for determining whether each notification unit of said plurality of notification units is available to receive system management information (Specification, page 13, line 19 – page 14, line 11). Third instructions for coupling a plurality of management units to said network (Specification, page 14, lines 17-23 and Figure 4, element 400). Fourth instructions for generating said system management information (Specification, page 14, line 17 – page 15, line 5). Fifth instructions for determining an identity of an intended recipient for said system

management information (Specification, page 3, lines 9-12). Sixth instructions for associating said identity with at least one notification unit of said plurality of notification units (Specification, page 15 line 6 – page 16, line 5). Seventh instructions for determining whether said at least one notification unit is available to receive said system management information (Specification, page 3, lines 12-15). Eighth instructions for converting said system management information into a form that is appropriate for the notification unit (Specification, page 12, line 27 – page 13, line 6, and page 16, lines 5-9).

# GROUNDS OF REJECTION TO BE REVIEWED ON APPEAL

The grounds of rejection to review on appeal are as follows:

- 1. Whether claims 19-20 are directed to non-statutory subject matter under 35 U.S.C. § 101; and
- 2. Whether claims 1-20 are anticipated by Holt, et al., WO 03/098449 A1 under 35 U.S.C. § 102(a).

#### **ARGUMENT**

## A. GROUND OF REJECTION 1 (Claims 19-20)

The Examiner rejects claims 19-20 under 35 U.S.C. § 101 as being directed to non-statutory subject matter. This rejection is respectfully traversed.

In rejecting the claims, the Examiner states:

Claims 19-20 are not limited to tangible embodiments. In view of Applicant's disclosure, specification page 16, line 16 – page 17, line 4, the medium is not limited to tangible embodiments, instead being defined as including both tangible embodiments (e.g., floppy disk, a hard disk, etc.) and intangible embodiments (e.g., transmission-type media). As such, the claims are not limited to statutory subject matter and are therefore non-statutory.

Final Office Action dated November 13, 2006 pages 2-3.

The Examiner alleges that claims 19 and 20 are not limited to tangible embodiments. In addition, the Examiner alleges that the computer readable medium recited in independent claim 19 includes both tangible and intangible embodiments as defined in the specification on page 16, line 16 – page 17, line 4. However, no basis exists for holding a computer program product claim as non-statutory because the computer readable medium may be allegedly intangible.

The Manual of Patent Examining Procedure ("MPEP") states in §2106 Patentable Subject Matter - Computer-Related Inventions (I) that "[c]omputer-related inventions' include inventions implemented in a computer and inventions employing computer-readable media." Moreover, the MPEP states:

..."[F]unctional descriptive material" consists of <u>data structures</u> and computer programs <u>which impart functionality when employed as a computer component</u>. (The definition of "data structure" is "a physical or logical relationship among data elements, designed to support specific data manipulation functions." The New IEEE Standard Dictionary of Electrical and Electronics Terms 308 (5th ed. 1993).) "Nonfunctional descriptive material" includes but is not limited to music, literary works and a compilation or mere arrangement of data.

When functional descriptive material is recorded on some computer-readable medium it becomes structurally and functionally interrelated to the medium and will be statutory in most cases since use of technology permits the function of the descriptive material to be realized. Compare In re Lowry, 32 F.3d

1579, 1583-84, 32 U.S.P.Q.2d 1031, 1035 (Fed. Cir. 1994) (claim to data structure stored on a computer readable medium that increases computer efficiency held statutory) and *Warmerdam*, 33 F.3d at 1360-61, 31 U.S.P.Q.2d at 1759 (claim to computer having a specific data structure stored in memory held statutory product-by-process claim) with *Warmerdam*, 33 F.3d at 1361, 31 U.S.P.Q.2d at 1760 (claim to a data structure *per se* held nonstatutory). [Emphasis added].

#### MPEP §2106 (IV)(B)(1).

The present invention recited in claim 19 is clearly functional descriptive material because it imparts functionality when employed as a computer component. Further, the functional descriptive material of claim 19 is recorded on "some" computer readable medium.

In the context of the MPEP passage above, the term "some" means "any." The MPEP makes no distinction between one type of media that is considered to be statutory and another type of media that is considered to be non-statutory. To the contrary, the MPEP states that as long as the functional descriptive material is in "some" computer readable medium, it should be considered statutory. The only exception is functional descriptive material that does not generate a useful, concrete, and tangible result, for example, functional descriptive material composed completely of pure mathematical concepts that provide no practical result. The present invention recited in independent claim 19 provides a useful, concrete, and tangible result for routing system management information by coupling a network to a plurality of notification units, determining whether each notification unit of the plurality of notification units is available to receive system management information, coupling a plurality of management units to the network, generating the system management information, determining an identity of an intended recipient for the system management information, associating the identity with at least one notification unit of the plurality of notification units, determining whether the at least one notification unit is available to receive the system management information, and converting the system management information into a form that is appropriate for the notification unit. Consequently, the present invention as recited in claim 19 is not some disembodied mathematical concept or abstract idea. Therefore, claim 19 is directed to functional descriptive material that provides a useful, concrete, and tangible result and is embodied on "some" computer readable medium. Thus, independent claim 19 recites statutory subject matter.

Furthermore, even if, for the sake of argument, claim 19 covers transmission-type media, or carrier waves and signals, the allegation that transmission-type media is "intangible" is incorrect. The term "tangible" is not limited to elements that may be perceived only by the sense of touch. The term "tangible" refers to anything that is capable of being perceived, precisely identified or realized by the mind, or capable of being appraised at an actual or approximate value. [Please see the attached Merriam-Webster Online Dictionary definition of the word tangible]. In other words, something is "tangible" if it is possible to verify its existence. Thus, "tangible" does not require that the element be "touchable" but merely "perceivable."

Transmission-type media, or carrier waves and signals, are perceivable, able to be precisely identified or realized by the mind, and are capable of being appraised. Computer readable media must inherently be "perceivable;" otherwise, the computer readable media would not be computer readable or computer usable. In other words, transmission-type media, or carrier waves and signals, are measurable, readable, and usable by appropriate devices for measuring, reading, and using such media, waves, and signals. Thus, transmission-type media, or carrier waves and signals, are "tangible" despite the allegation made in the Final Office Action to the contrary. Consequently, even if there were some MPEP requirement that the media be "tangible," which there is not, claim 19, as recited, would still meet that requirement. Hence, the present invention recited in claim 19 is directed to statutory subject matter.

Therefore, based on the MPEP and applicable case law above, the Examiner has no basis for holding claim 19 to be non-statutory. Claims 20 is a dependent claim depending on independent claim 19. As a result, claim 20 also recites statutory subject matter at least by virtue of its dependence on independent claim 19. Accordingly, the rejection of claims 19 and 20 as being directed to non-statutory subject matter has been overcome.

### B. GROUND OF REJECTION 2 (Claims 1-20)

The Examiner rejects claims 1-20 under 35 U.S.C. § 102 as being anticipated by *Holt*, *et al.*, International Publication No. WO 03/098449 A1 ("Holt"). This rejection is respectfully traversed.

A prior art reference anticipates the claimed invention under 35 U.S.C. § 102 only if every element of a claimed invention is identically shown in that single reference, arranged as they are in the claims. *In re Bond*, 910 F.2d 831, 832, 15 U.S.P.Q.2d 1566, 1567 (Fed. Cir. 1990). All

limitations of the claimed invention must be considered when determining patentability. *In re Lowry*, 32 F.3d 1579, 1582, 32 U.S.P.Q.2d 1031, 1034 (Fed. Cir. 1994). Anticipation focuses on whether a claim reads on the product or process a prior art reference discloses, not on what the reference broadly teaches. *Kalman v. Kimberly-Clark Corp.*, 713 F.2d 760, 218 U.S.P.Q. 781 (Fed. Cir. 1983). In this case, each and every feature of the presently claimed invention is not identically shown in the cited reference as arranged in the claims.

Independent claim 1 of the present invention, which is representative of independent claims 10 and 19 with regard to similarly recited subject matter, reads as follows:

1. A data processing system for routing system management information, comprising:

a plurality of notification units;

a network coupled to said plurality of notification units, said network operable to determine whether each notification unit of said plurality of notification units is available to receive system management information; and

a plurality of management units coupled to said network, at least one management unit of said plurality of management units configured to perform the steps:

generate said system management information;

determine an identity of an intended recipient for said system management information;

associate said identity with at least one notification unit of said plurality of notification units:

determine whether said at least one notification unit is available to receive said system management information; and

send said system management information to said at least one notification unit via a notification handler if said at least one notification unit is available to receive said system management information.

In rejecting the claim, the Examiner states:

Regarding claim 1:

Holt teaches:

a plurality of notification units (paragraph 0017 lines 5-7);

a network coupled to said plurality of notification units, said network operable to determine whether each notification unit of said plurality of notification units is available to receive system management information (Fig. 1 and paragraph 0030); and

a plurality of management units coupled to said network (Fig. 3), at least one management unit of said plurality of management units configured to perform the steps:

generate said system management information (paragraph 0017 lines 1-3); determine an identity of an intended recipient for said system management information (paragraph 0024 lines 10-12);

associate said identity with at least one notification unit of said plurality of notification units (paragraph 0017 lines 5-7 and paragraph 0030 lines 5-8);

determine whether said at least one notification unit is available to receive said system management information (paragraph 0030); and

send said system management information to said at least one notification unit via a notification handler if said at least one notification unit is available to receive said system management information (paragraph 0017).

Final Office Action dated November 13, 2006, pages 3-4.

Holt teaches a method for providing presence and availability status information of a first user to a second user. The system includes a presence availability server for storing presence and availability status information of the first user. The presence availability server is configured to detect a change in the presence and availability status of the first user. The presence availability server also informs a notification server of a change in the presence and availability status of the first user. The notification server sends a notification message to a communication device of the second user. The notification message contains current presence and availability status information of the first user. [Emphasis added]. Holt, Abstract. In other words, Holt only teaches a method for generating and sending information regarding a user's online presence and availability to another user.

In contrast, claim 1 recites that a management unit is configured to generate and send "system management information" to at least one notification unit. In other words, the management unit generates and sends information regarding the management of the system. Holt instead teaches a system that generates and sends information regarding the presence and availability of a user.

The Examiner states that "[s]ystem management information is clearly defined in applicant's specification to include notification or event information (Specification, page 5, lines 21-24). The notification message of Holt clearly meets this definition of system management information." Final Office Action dated November 13, 2006, page 7, lines 5-8. However, even though the specification on page 5 defines system management information as event or notification information, this Examiner-cited passage goes on to state that routing system management information is "described below with respect to Figure 4." The detailed description

of Figure 4 further defines system management information to "include text...related...to the occurrence of an event (e.g. critical failure of a system component), notification information related to an event, and/or system administrative information." Specification, page 11, lines 18-23.

In addition, the detailed description of Figure 4 teaches that:

...management agent 416 can include a management service application that monitors or manages a managed resource (e.g., managed resources 418, 420). Therefore, management agent 416 can derive system management information (e.g., critical failure, notification information, etc.) from one or both of managed resources 418, 420. Also, each managed resource (e.g., each of managed resources 418, 420, 424, 426) can generate system management information independently of management agent 416. Each managed resource 418, 420, 424, 426 can be, for example, an OS (e.g., Linux, AIX, etc.), J2EE container, or similar network software or hardware resource. [Emphasis added].

Specification, page 14, line 23 – page 15, line 5.

In other words, the specification teaches that the system management information is data regarding the occurrence of an event, such as a critical failure of a system component or notification information relating to a critical failure of a system component. In construing the meaning of a claim limitation, it is entirely proper to look to the specification in order to interpret what the inventor intended by the claim term. *In re Sneed*, 710 F2d. 1544, 1548, 218 U.S.P.Q. 385, 388 (Fed. Cir. 1983) ("It is axiomatic that, in proceedings before the PTO, claims in an application are to be given their broadest reasonable interpretation consistent with the specification, . . . , and that claim language should be read in light of the specification as it would be interpreted by one of ordinary skill in the art."); *In re Marosi*, 710 F.2d 799, 802-03, 218 U.S.P.Q. 289, 292 (Fed. Cir. 1983) ("It is well established that 'claims are not to be read in a vacuum, and limitations therein are to be read in light of the specification . . .""); *In re Ehrreich*, 590 F.2d 902, 907, 200 U.S.P.Q. 504, 508 (C.C.P.A. 1979). When the specification states the meaning that a term in the claim is intended to have, the claim is examined using that meaning, in order to achieve a complete exploration of the applicant's invention and its relation to the prior art. *In re Zletz*, 893 F.2d 319, 13 U.S.P.Q.2d 1320 (Fed. Cir. 1989).

System management information in "its relation to the prior art" may be seen in the "Description of Related Art" section of the specification. This section states that:

Management agents and/or managed resources in computer-based management systems typically send <u>event information</u> to system administrators in order to notify the administrators about the <u>occurrence of critical failures</u> or to periodically deliver summary statistics. In most of the existing management system environments, these events/notifications are typically directed to a centralized entity in the management system. The effectiveness of the management response to the event, and in particular to the <u>critical failure information</u>, depends to a great extent on the parties responsible for responding to the incoming event information.... [Emphasis added].

Specification, page 1, lines 9-21.

In other words, a problem that Appellants were endeavoring to solve at the time of the invention was the efficient dissemination of system management information with regard to the critical failure of system components. Thus, the generating and sending of system management information as recited in claim 1 and defined in the specification is not analogous to the generating and sending of notification messages, which only relate to changes in user online status, as taught by Holt, paragraph 0017, as the Examiner alleges. Therefore, Holt does not teach generating and sending "system management information" as recited in claim 1.

As a result, Holt does not identically teach each and every element recited in claim 1 of the present invention. Accordingly, in view of the arguments above, Appellants respectfully urge the Board of Patent Appeals and Interferences not to sustain the rejection of independent claims 1, 10, and 19 as being anticipated by Holt. Claims 2-9, 11-18, and 20 are dependent claims depending on independent claims 1, 10, and 19, respectively. Consequently, Appellants respectfully urge the Board of Patent Appeals and Interferences not to sustain the rejection of dependent claims 2-9, 11-18, and 20, at least by virtue of their dependence on independent claims 1, 10, and 19. Furthermore, these dependent claims also contain additional features not taught by Holt.

#### B.1. Dependent Claims 8 and 17

For example, dependent claim 8 of the present invention, which is representative of dependent claims 17, reads as follows:

8. The data processing system of Claim 1, wherein said intended recipient comprises at least one of an entity, party and person having a responsibility for responding to said system management information.

In rejecting the claim, the Examiner states:

Regarding claim 8:

Holt teaches:

wherein said intended recipient comprises at least one of an entity, party and person having a responsibility for responding to said system management information (paragraphs 0004 and 0017).

Final Office Action dated November 13, 2006, pages 5-6.

The Examiner cites Holt, paragraphs 0004 and 0017 as teaching the features recited in claim 8. These Examiner-cited passages read as follows:

[0004] Presence and availability information is most useful when an individual shares his or her online status with a trusted group of users. A communication message sent to someone who is readily present and available is less obtrusive, when the addressee has made himself or herself available to the communication. However, today's services mostly focus on a "pull" model for users to retrieve others' presence and availability status. Typically, a user has to log on a communication network before the user is notified about the presence and availability of other users on the network. Thus, a heretofore unaddressed need exists in the industry to address the aforementioned deficiencies and inadequacies.

[0017] The presence availability notification system 100 also includes a notification server 140 that receives update messages from the presence availability server 110 concerning a change in the presence and availability status of User1. The notification server 140 then sends a notification message to the communication device 150 of User2 to notify User2 of a change in the online status of User1. The User2 communication device 150 includes any device that User2 can receive a notification message with, such as a PSTN phone, an email client, an instant messaging client, etc.

Holt, paragraph 0004 and 0017, respectively.

Even though the passages from the Holt reference above may teach that an online user is present and available to receive an incoming message, Holt does not teach that the present and available user has a "responsibility for responding" to the incoming message. In contrast, claim 8 recites that the intended recipient of the system management information has a "responsibility for responding" to the system management information. The term "responsibility" means the state

of being responsible, which is a duty, obligation, or burden. [Please see the attached American Heritage® Dictionary definition of the word responsibility]. In other words, the intended recipient has a duty or an obligation to respond to the system management information as recited in claim 8. Holt makes no reference to a duty or obligation by a present and available online user to respond to an incoming message. Holt only teaches that the "addressee has made himself or herself available to the communication." Holt, paragraph 0004, lines 3-4. Therefore, Holt does not identically teach the features recited in dependent claims 8 and 17.

Accordingly, Appellants respectfully urge the Board of Patent Appeals and Interferences not to sustain the rejection of claim 1-20 as being anticipated Holt.

/Peter B. Manzo /
Peter B. Manzo
Reg. No. 54,700
YEE & ASSOCIATES, P.C.
PO Box 802333
Dallas, TX 75380
(972) 385-8777
Attorney for Applicants

## **CLAIMS APPENDIX**

The text of the claims involved in the appeal are:

A data processing system for routing system management information, comprising:
 a plurality of notification units;

a network coupled to said plurality of notification units, said network operable to determine whether each notification unit of said plurality of notification units is available to receive system management information; and

a plurality of management units coupled to said network, at least one management unit of said plurality of management units configured to perform the steps:

generate said system management information;

determine an identity of an intended recipient for said system management information; associate said identity with at least one notification unit of said plurality of notification units;

determine whether said at least one notification unit is available to receive said system management information; and

send said system management information to said at least one notification unit via a notification handler if said at least one notification unit is available to receive said system management information.

2. The data processing system of Claim 1, wherein said notification handler converts said system management information into a form that is appropriate for the notification unit.

- 3. The data processing system of Claim 1, wherein said network comprises a presence network.
- 4. The data processing system of Claim 1, wherein said network comprises an instant messaging network.
- 5. The data processing system of Claim 1, wherein said at least one notification unit comprises an instant messaging client associated with said intended recipient.
- 6. The data processing system of Claim 1, wherein said at least one management unit comprises at least one of a management agent and a managed resource.
- 7. The data processing system of Claim 1, wherein said system management information comprises event information or notification information.
- 8. The data processing system of Claim 1, wherein said intended recipient comprises at least one of an entity, party and person having a responsibility for responding to said system management information.
- 9. The data processing system of Claim 1, wherein the operation to determine said identity comprises an operation to access an on-call list of responsible entities, parties or persons.

10. A method in a data processing system for routing system management information, the method comprising the steps of:

coupling a network to a plurality of notification units;
said network determining whether each notification unit of said plurality of notification units is
available to receive system management information;

coupling a plurality of management units to said network; and

at least one management unit of said plurality of management units generating said system management information, determining an identity of an intended recipient for said system management information, associating said identity with at least one notification unit of said plurality of notification units, determining whether said at least one notification unit is available to receive said system management information and sending said system management information to said at least one notification unit via a notification handler if said at least one notification unit is available to receive said system management information.

- 11. The method of Claim 10, further comprising the step of said notification handler converting said system management information into a form that is appropriate for the notification unit.
- 12. The method of Claim 10, wherein said network comprises a presence network.
- 13. The method of Claim 10, wherein said network comprises an instant messaging network.
- 14. The method of Claim 10, wherein said at least one notification unit comprises an instant messaging client associated with said intended recipient.

- 15. The method of Claim 10, wherein said at least one management unit comprises at least one of a management agent and a managed resource.
- 16. The method of Claim 10, wherein said system management information comprises event information or notification information.
- 17. The method of Claim 10, wherein said intended recipient comprises at least one of an entity, party and person having a responsibility for responding to said system management information.
- 18. The method of Claim 10, wherein the step to determine said identity comprises accessing an on-call list of responsible entities, parties or persons.
- 19. A computer program product in a computer-readable medium for routing system management information, the computer program product comprising:

first instructions for coupling a network to a plurality of notification units;

second instructions for determining whether each notification unit of said plurality of notification units is available to receive system management information;

third instructions for coupling a plurality of management units to said network;

fourth instructions for generating said system management information;

fifth instructions for determining an identity of an intended recipient for said system management information;

sixth instructions for associating said identity with at least one notification unit of said plurality of notification units;

seventh instructions for determining whether said at least one notification unit is available to receive said system management information; and

eighth instructions for converting said system management information into a form that is appropriate for the notification unit.

20. The computer program product of Claim 19, further comprising:

eighth instructions for converting said system management information into a form that is appropriate for the notification unit.

# **EVIDENCE APPENDIX**

Merriam-Webster Online Dictionary definition of the word "tangible." (Please see attached sheet).

The American Heritage® Dictionary of the English Language, Fourth Edition, definition of the word "responsibility." (Please see attached sheet).

# **RELATED PROCEEDINGS APPENDIX**

There are no related proceedings.

# tangible

2 entries found for tangible.

To select an entry, click on it.

tangible[1,adjective] tangible[2,noun]

Go

Main Entry: <sup>1</sup>tan-gi-ble ◆ Pronunciation: 'tan-j&-b&l

Function: adjective

Etymology: Late Latin tangibilis, from Latin

tangere to touch

**1 a**: capable of being perceived especially by the sense of touch: <u>PALPABLE</u> **b**: substantially real: <u>MATERIAL</u>

2: capable of being precisely identified or realized by the mind <her grief was tangible>

**3**: capable of being appraised at an actual or approximate value <*tangible* assets>

## synonym see PERCEPTIBLE

- tan-gi-bil-i-ty /"tan-j&-'bi-l&-tE/ noun
- tan-gi-ble-ness 4) /'tan-j&-b&l-n&s/ noun
- tan-gi-bly 4) /-blE/ adverb

The American Heritage® Dictionary of the English Language: Fourth Edition. 2000.

# responsibility

SYLLABICATION: re·spon·si·bil·i·ty

 $\underline{PRONUNCIATION}: \quad \boldsymbol{\preccurlyeq}_{\vec{1}\vec{1}\text{-spŏn'se-bĭl'}\vec{1}\text{-}t\overline{\textbf{e}}}$ 

NOUN: Inflected forms: pl. re·spon·si·bil·i·ties

1. The state, quality, or fact of being responsible. 2. Something for

which one is responsible; a duty, obligation, or burden.